

**UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

DONNA CURLING, ET AL.,	:	
	:	
Plaintiff,	:	Civil Action No.: 1:17-cv-2989-AT
	:	
vs.	:	
	:	
BRAD RAFFENSPERGER, ET	:	
AL.,	:	
	:	
Defendant.	:	

**STATE DEFENDANTS' MOTION TO SEAL DOCUMENTS RELATED TO  
THE PARTIES' JOINT DISCOVERY STATEMENT**

Defendant Brad Raffensperger (“Defendant” or “Secretary”), in his official capacity as Secretary of the State of Georgia and as Chair of the State Election Board of Georgia and Defendants David J. Worley, Rebecca N. Sullivan and Seth Harp (collectively, “State Defendants”) seek to seal or redact the parties’ joint discovery statement and exhibits thereto, [Doc. 487], and GEMS database screenshots filed by Curling Plaintiffs. Public disclosure of the sensitive information in these documents could threaten the security of Georgia’s election system. For the reasons stated in the brief in support hereof, the Court should grant this Motion.

Respectfully submitted, this 16th day of July, 2019.

/s/ Vincent R. Russo

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**LOCAL RULE 7.1(D) CERTIFICATION**

I certify that this brief was prepared in compliance with Local Rule 5.1C in  
that it is in Times New Roman 14-point font.

*/s/ Vincent R. Russo*

Vincent R. Russo

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day filed the within and foregoing **STATE DEFENDANTS' MOTION TO SEAL DOCUMENTS RELATED TO THE PARTIES' JOINT DISCOVERY STATEMENT** with the Clerk of Court using the CM/ECF system, which will automatically send counsel of record e-mail notification of such filing.

This 16th day of July, 2019.

*/s/ Vincent R. Russo*  
Vincent R. Russo